

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X  
ROSIE MARTINEZ,

Plaintiff,

-against-

CITY OF NEW YORK, et al.,

Defendants.  
----- X

**DEFENDANTS' PROPOSED  
SPECIAL  
INTERROGATORIES<sup>1</sup>**

16 CV 79 (NM) (CLP)

1) Did plaintiff request medical attention while she was at the 107th Precinct?

YES \_\_\_\_\_ NO \_\_\_\_\_

2) If plaintiff did request medical attention while she was at the 107th Precinct, did defendant Eric Ryan know that plaintiff requested medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

3) Did defendant Eric Ryan reasonably believe, even if mistaken, that plaintiff did not require urgent medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

4) Did defendant Eric Ryan reasonably believe, even if mistaken, that plaintiff did not sustain a serious injury?

YES \_\_\_\_\_ NO \_\_\_\_\_

5) If plaintiff did request medical attention while she was at the 107th Precinct, did defendant Joseph DiGennaro know that plaintiff requested medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

6) Did defendant Joseph DiGennaro reasonably believe, even if mistaken, that plaintiff did not require urgent medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

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<sup>1</sup> Defendants reserve the right to propose supplemental special interrogatories based upon the testimony and any rulings of the Court during trial.

- 7) Did defendant Joseph DiGennaro reasonably believe, even if mistaken, that plaintiff did not sustain a serious injury?

YES \_\_\_\_\_ NO \_\_\_\_\_

- 8) If plaintiff did request medical attention while she was the 107th Precinct, did defendant David Camhi know that plaintiff requested medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

- 9) Did defendant David Camhi reasonably believe, even if mistaken, that plaintiff did not require urgent medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

- 10) Did defendant David Camhi reasonably believe, even if mistaken, that plaintiff did not sustain a serious injury?

YES \_\_\_\_\_ NO \_\_\_\_\_

- 11) If plaintiff did request medical attention while she was the 107th Precinct, did defendant Keith Laliberte know that plaintiff requested medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

- 12) Did defendant Keith Laliberte reasonably believe, even if mistaken, that plaintiff did not require urgent medical attention?

YES \_\_\_\_\_ NO \_\_\_\_\_

- 13) Did defendant Keith Laliberte reasonably believe, even if mistaken, that plaintiff did not sustain a serious injury?

YES \_\_\_\_\_ NO \_\_\_\_\_

Dated: New York, New York  
December 6, 2022

HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel of the City of New York  
*Attorney for Defendants*  
100 Church Street  
New York, New York 10007  
(212) 356-2351

By: /s/ *Kavin Thadani*  
Kavin Thadani

cc: **VIA ECF**  
Gabriel Harvis, Esq.  
Baree Fett, Esq.  
Wayne Wattley, Esq.  
*Attorneys for Plaintiff*